



11691 or Interfaith Medical Center, 1545 Atlantic Ave, Brooklyn, New York, 11213. St John's Episcopal Hospital South Shore (Episcopal Health Services Inc.) operates and does business at 327 Beach 19<sup>th</sup> Street, Far Rockaway, New York, 11691, ATTN: CEO Richard Brown. Service of process may be served at 700 HICKSVILLE ROAD, BETHPAGE, NEW YORK, 11714-3473 and/or 327 Beach 19<sup>th</sup> Street, Far Rockaway, New York, 11691. Interfaith Medical Center operates and does business at 1545 Atlantic Ave, Brooklyn, New York, 11213, where service of process may be served at Interfaith Medical Center, 1545 Atlantic Ave, Brooklyn, New York, 11213.

## **II.**

This Court has subject-matter jurisdiction because the dispute is based upon a Federal Question under the U.S. Constitution. This court has jurisdiction over the state law claim based on supplemental jurisdiction under U.S.C. § 1367. This court has venue under 28 U.S. Code § 1391(b)(2), because it is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred. This court also has personal jurisdiction over the Defendants because the court has the power to enforce its decision upon the parties to this suit. In addition, this court has original jurisdiction under 28 U.S. Code § 1332 (a)(1), because the matter in controversy exceeds the sum of \$75,000, and is between citizens of different States.

## **III.**

Plaintiff, DR. SONIA HERNANDEZ, resides in HIDALGO COUNTY, TEXAS, and the Discrimination, Defamation and Retaliation in question took place in the state of Texas, and therefore jurisdiction and venue are proper under U.S.C. § 1367, 28 U.S. Code § 1391(b)(2), & 28 U.S. Code § 1332 (a)(1).

IV.

Plaintiff complains that she was retaliated against because of her sex, female Hispanic, in violation of Title VII of the Civil Rights Acts of 1964, as amended. Plaintiff also complains that she was retaliated against for being a “WHISTLEBLOWER” and for having filed complaints with the Equal Employment Opportunity Commission (EEOC) in New York, New York and Dallas, Texas. Plaintiff complains that she was denied equal rights, deprived of her rights, and discriminated due to her sex, female, Hispanic, under 42 USC § 1981, 42 USC § 1983, and 42 USC § 2000 e-2. Plaintiff complains that she was deprived of her rights of equal protection and due process of the laws under the V Amendment & XIV Amendment of the Constitution of the United States. Plaintiff also complains of defamation by Dr. Steven Sherman. Plaintiff complains that she was denied a Texas Medical license due to the defamation/libel/slander that Dr. Steven Sherman inflicted upon Plaintiff with his malicious, intentionally, and false statements to Plaintiff’s former employer and the Texas Medical Board. The evidence will show that Plaintiff was injured due to the false, malicious, and intentional false statements Dr. Steven Sherman provided to Plaintiff’s former employer Avera Queen of Peace Hospital. Dr. Steven Sherman knowingly, intentionally and with malice injured Plaintiff when the Texas Medical Board refused to issue Plaintiff her license to practice medicine in the State of Texas. The evidence will show that Dr. Steven Sherman’s employers St. John’s Episcopal Hospital South Shore (Episcopal Health Services Inc.) and Interfaith Medical Center, both hospitals that employed Dr. Steven Sherman knew that he had discriminated, retaliated, and libeled Plaintiff because

Plaintiff had filed a grievance thru her Union against Dr. Steven Sherman while she was working at these hospitals.

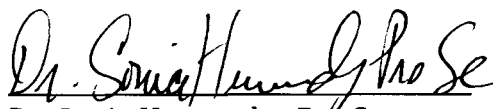
V.

Plaintiff respectfully requests that a jury be convened to try the factual issues of the case.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that defendants be cited to answer and appear, and that upon final hearing, Plaintiff prays for Judgment against Defendants in the amount of Ten (10) Million Dollars, for all costs of suit herein, for pre-judgment and post-judgment interest at the legal rate and for such other relief in law and in equity as the nature of the case may require or as the Court may otherwise order. Furthermore, plaintiff prays that punitive damages in the amount of One (1) Million Dollars be awarded plaintiff for the hardship placed upon plaintiff.

Dated this 14<sup>th</sup> day of August 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dr. Sonia Hernandez Pro Se". The signature is written in a cursive, flowing style.

Dr. Sonia Hernandez Pro Se  
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